IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

RALPH S. JANVEY, IN HIS CAPACITY	AS §	
COURT-APPOINTED RECEIVER FOR T	THE §	
STANFORD INTERNATIONAL BANK,	LTD., §	
ET AL.	§	
	§ Case No. 03:10-CV-13	94-N-BG
Plaintiff,	§	
	§	
v.	§	
	§	
RONALD WIESELBERG, ET AL.	§	
	§	
Defendants.	§	

RECEIVER'S RESPONSE AND OBJECTIONS TO MOTIONS TO WITHDRAW AS COUNSEL FOR DEFENDANTS RICARDO COBIELLA AND RONALD WIESELBERG

Receiver Ralph S. Janvey hereby files his Response and Objections to Motions to Withdraw as Counsel for Defendants Ricardo Cobiella and Ronald Wieselberg [see Docs. 65, 66 (collectively, the "Motions to Withdraw")], respectfully stating as follows:

John Campbell and Jose F. Torres of the Law Offices of Campbell & Malafy ("Movant Counsel") are currently the attorneys of record for defendants Ricardo Cobiella and Ronald Wieselberg. On July 28th, Movant Counsel filed their Motions to Withdraw. On August 11th, counsel for the Receiver contacted Movant Counsel to discuss certain deficiencies with respect to the Motions to Withdraw. In particular, Movant Counsel were informed that the Motions to Withdraw do not contain their clients' phone numbers and do not contain either client signatures approving their withdrawal or an explanation of why the signatures are absent. *See* Local Rule 83.12(a) ("If the succeeding attorney is not known, the motion must set forth the name, address, and telephone number of the client and either bear the client's signature

approving withdrawal or state specifically why, after due diligence, the attorney was unable to obtain the client's signature.").

Counsel for the Receiver requested Movant Counsel to correct the Motions to Withdraw so that the Receiver could avoid filing an objection to the Motions. Although Movant Counsel agreed to do so, to date the Motions to Withdraw have not been corrected. As a result, the Receiver objects to the Motions to Withdraw because they do not confirm to this Court's Local Rules. The Receiver, therefore, requests that the Court deny the Motions to Withdraw and require Movant Counsel to provide the missing information.

Dated: August 18, 2014 Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ Kevin M. Sadler

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ATTORNEYS FOR
RECEIVER RALPH S. JANVEY

CERTIFICATE OF SERVICE

On August 18, 2014, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I will serve all parties and counsel of record electronically or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Kevin M. Sadler
Kevin M. Sadler